

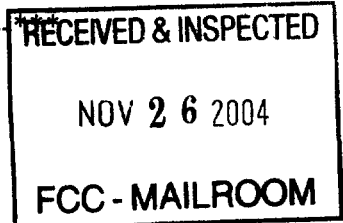
BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C. 20554

**ORIGINAL**

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In re Amendment of Section 73.202(b) )  
of the Commission's Rules, Table of Allotments, )  
FM Broadcast Stations )  
(MONUMENT, OREGON) )

MM Docket No. 04-\*\*\*  
RM-\*\*\*\*\*



To: The Office of the Secretary,  
for the Attention of the Assistant Chief, Audio Division, Media Bureau

### PETITION FOR RULE MAKING

Klickitat Broadcasting (*Klickitat*), by its communications counsel, hereby asks the FCC to initiate a rule-making proceeding looking toward the allotment of Channel 229A to the community of Monument, Oregon, as a first local service.

1. This Petition seeks the allotment of Channel 229A to Monument, Oregon as a first local service. The requested allotment requires no site restriction.<sup>1</sup>

2. As Exhibit A to this Petition, the Engineering Statement of Hatfield & Dawson Consulting Electrical Engineers, shows in greater detail, the proposed allotment of Channel 229A to Monument comports with domestic spacing requirements. Exhibit A also demonstrates that the proposed allotment of Channel 229A would result in full city-grade-service to Monument.

3. Schematically, Klickitat's proposal is as follows:

COMMUNITY	PRESENT ALLOTMENT	PROPOSED ALLOTMENT
Monument, Oregon	---	229A

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List ABCDE

MB 04-199

<sup>1</sup> Reference point: North Latitude 44° 49' 10"; West Longitude 119° 25' 12".

4. The requested allotment will provide Monument, an incorporated city with a 2000 Census population of 151 persons, with its first local service. Grant of the proposed allotment at Monument will also provide a total of 859 persons within the 60-dB $\mu$  contour with an additional protected aural service.

5. The City of Monument derives its name from a nearby mountain of peculiar shape, Monument Mountain, which resembles a pulpit or rostrum. Monument is situated along the banks of the North Fork John Day River in Grant County. The area was settled in 1852 by Isaac Vilmott, and Monument was incorporated in 1947. Monument Municipal Airport, owned by the City of Monument, serves Monument and Grant County.

6. The Monument Post Office was established on October 27, 1874, with Prior S. Wilson as postmaster. Monument's Zip Code is 97864. The Columbia Power Cooperative Association is based in Monument and has eleven full-time employees. The Cooperative's power system consists of 90 miles of 69-kV transmission line, 970 miles of overhead distribution line, and one mile of underground distribution line. The Columbia Power Cooperative Association was incorporated under the laws of the State of Oregon on August 27, 1948. The area was originally served by privately owned diesel plants in Ukiah, Spray, Mitchell and Monument. These diesel plants were purchased by the Cooperative shortly after the Charter of Incorporation was granted. The Cooperative began construction on the distribution lines between Spray, Monument, Mitchell and Hamilton in August 1951. On April 15, 1953, the Cooperative started receiving power from the Bonneville Power Administration. Service to the Ukiah area was delayed until December 3, 1954. The territory served by the Cooperative was certified by the Oregon Public Utility Commissioner in April, 1962.

7. The service area of the Columbia Power Cooperative Association, is located in northeastern-central Oregon, extending eastward to a point midway between Pendleton and John Day. The Cooperative serves areas in Grant, Umatilla and Wheeler Counties. About one-half of the Cooperative's territory is located in Northern Grant County, one-sixth in southern Umatilla County and the remainder is in northwest Wheeler County. Cities and areas served include Monument, Kimberly, Spray, Mitchell, Twickenham, Hamilton, Ritter, Ukiah, Dale and Susanville. There are no large population centers in the service area, with about one-half of the people being located in small towns and the remainder of the people in rural surrounding areas. The majority of the land located in the area is mountainous and forested. About 9,940 acres of bottom lands along the river are presently being irrigated. The main sources of recreation in the area consist of hunting and fishing.

8. Monument's incorporated status is *prima facie* evidence of its worthiness to enjoy an additional local service. Allotting Channel 229A to Monument will clearly further the goals of Section 307(b) of the Communications Act of 1934, as amended.

9. Klickitat states its intent to apply for a construction permit for Channel 229A at Monument, if allotted. Klickitat further states its intent, should Klickitat be awarded the construction permit, to build the authorized facilities, to place the constructed facilities into broadcast service, and to seek a license to cover those facilities.

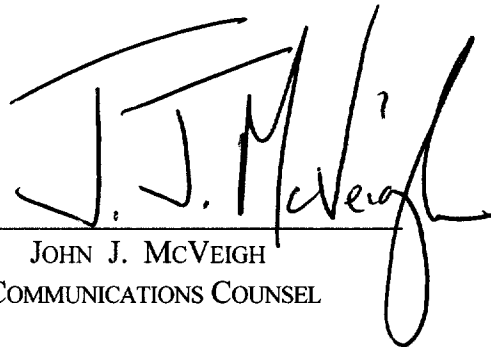
## CONCLUSION

10. For all of the above reasons, the staff should promptly issue a Notice of Proposed Rule Making proposing the adoption of Klickitat Broadcasting's request, the allotment of Channel 229A to the community of Monument, Oregon.

Respectfully submitted,

**KLICKITAT BROADCASTING**

By

A handwritten signature in black ink, appearing to read "J. J. McVeigh", written over a horizontal line.

JOHN J. McVEIGH

ITS COMMUNICATIONS COUNSEL

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DATE: NOVEMBER 23, 2004

## **EXHIBIT A**

JAMES B. HATFIELD, PE  
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STEPHEN S. LOCKWOOD, PE  
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## **ENGINEERING STATEMENT**

**PETITION FOR RULEMAKING TO  
AMEND SECTION 73.202 OF THE RULES  
AND REGULATIONS FOR THE FEDERAL  
COMMUNICATIONS COMMISSION**

**TO ALLOT FM CHANNEL 229A  
FOR USE AT MONUMENT, OREGON**

**KLICKITAT BROADCASTING**

**11/2004**

## **Engineering Statement**

This Engineering Statement has been prepared on behalf of Klickitat Broadcasting, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to allot Channel 229A for use at Monument, Oregon.

### **Channel 229A at Monument**

As outlined in the attached channel study, Channel 229A can be allotted for use at Monument in compliance with the Commission's applicable Rules and Regulations regarding the separation among domestic FM stations and allotments. For this study the community reference coordinates at N44-49-10 x W119-25-12 have been used. The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, and as demonstrated on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Monument.

The instant counterproposal will provide Monument, an incorporated city with a 2000 Census population of 151 persons, with its first local service.

Grant of the proposed allotment at Monument will provide a total of 859 persons within the 60 dBu contour with an additional aural service.

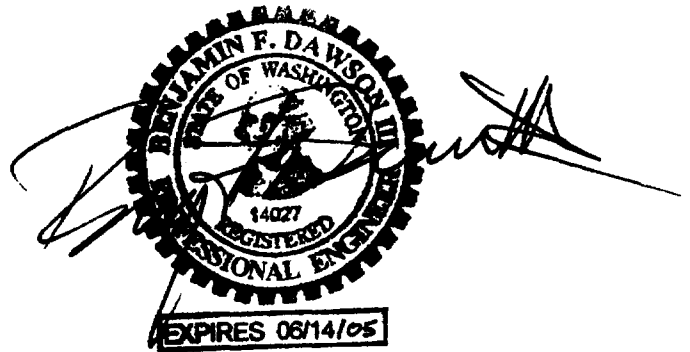
**Hatfield & Dawson Consulting Engineers**

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### Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Monument, Oregon, has been prepared by Erik C. Swanson under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 23<sup>rd</sup> day of November, 2004.



Benjamin F. Dawson III, P.E.

A handwritten signature in cursive script, reading "Erik C. Swanson".

Erik C. Swanson

Hatfield & Dawson Consulting Engineers



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SEARCH PARAMETERS FM Database Date: 041117  
 Channel: 229A 93.7 MHz Page 1  
 Latitude: 44 49 10  
 Longitude: 119 25 12  
 Safety Zone: 32 km  
 Job Title: MONUMENT 229A

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
	CONDON		228A	0.000	45-15-27	305.9	83.79	72
APP	OR	BSFH-040806AEF	93.5	0.0	120-17-08		11.79	CLEAR
	CONDON		228A	0.000	45-14-18	308.0	76.17	72
VAC	OR	-	93.5	0.0	120-11-06		4.17	CLOSE
K229AY	BAKER CITY		229D	0.013	44-44-27	93.2	132.84	0
CP	OR	BNPFT-030829ABH	93.7	461.0	117-44-43		0.00	TRANS
K229AX	JOHN DAY		229D	0.220 DA	44-26-03	139.4	56.36	0
CP	OR	BNPFT-030821AFE	93.7	266.0	118-57-29		0.00	TRANS
KGSG	PASCO		229A	0.600	46-04-59	8.1	141.90	115
LIC	WA	BLH-970409KA	93.7	292.0	119-09-38		26.90	CLEAR
44444 BEGINNING SEARCH OF SECONDARY DATABASE 44444								
None-H	MONUMENT		229A	0.000	44-49-10	0.0	0.00	115
VACANT	OR	-	93.7	0.0	119-25-12		-115.00	SHORT
44444 END OF FM SPACING STUDY FOR CHANNEL 229 44444								

